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The Court apologizes that this request  
fell through the cracks. The request to  
seal is GRANTED.

December 5, 2024

**VIA ECF**

The Honorable Arun Subramanian  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007

SO ORDERED.



Arun Subramanian, U.S.D.J.  
Dated: March 17, 2025

Re: *Employees Retirement System for the City of Providence v. Board of  
Governors of the Federal Reserve System*, No. 1:24-mc-349-AS (S.D.N.Y.) –  
Letter Motion To File Under Seal.

Dear Judge Subramanian,

We represent Petitioner Employees Retirement System for the City of Providence (“Petitioner”). Pursuant to Rule 11(C)(ii)-(iii) of Your Honor’s Individual Practices in Civil Cases, Petitioner respectfully submits this letter motion requesting (i) to file under seal Exhibit A to the Affirmation of Jeremy Robinson in Support of Letter Motion to Supplement the Record, and (ii) to file redacted portions of Petitioner’s Letter Motion to Supplement the Record and Exhibit B to the Affirmation of Jeremy Robinson in Support of Letter Motion to Supplement the Record.

The reasons sought for sealing involve the same issues in the motion seeking leave to file a miscellaneous action under seal, granted by Judge Ronnie Abrams on July 29, 2024, 24-mc-340, ECF No. 3, and the previous Letter Motion to Seal in this action, that the Court granted on September 13, 2024, ECF No. 34: Credit Suisse Group AG has designated Exhibit A as confidential in the underlying action. In addition, the Federal Reserve has sought to claw back Exhibit A as privileged and confidential. While Petitioner disagrees with both the confidentiality designation and the Federal Reserve’s purported assertion of privilege, it makes this motion to comply with the stipulated protective order in the underlying action, which obligates Petitioner to seek to seal documents marked as confidential by the producing party, and to preserve the Federal Reserve’s purported privilege pending resolution of Petitioner’s summary judgment motion pending before Your Honor. Robinson Affirmation (ECF No. 6), Exhibit A at Exhibit B at 14; ECF No. 4. For the same reasons, Petitioner seeks to redact those portions of the Letter

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Motion to Supplement the Record and Exhibit B to the Robinson Affirmation that discuss Exhibit A in a way that could reveal protected information. Petitioner respectfully reserves all rights concerning these designations.

Petitioner respectfully requests that the Court permit the Letter Motion, Exhibit A, and Exhibit B to be filed in redacted and sealed form. Pursuant to the Court's Individual Practices in Civil Cases, Petitioner will file through the ECF system Exhibit A under seal and electronically relate it to this Letter Motion. Petitioner will also file its Letter Motion and Exhibit B with the proposed redactions applied and will simultaneously file under seal a copy of the Letter Motion and Exhibit B with the proposed redactions highlighted.

Respectfully submitted,

/s/ Jeremy P. Robinson

Jeremy P. Robinson

cc: All Counsel of Record (by ECF)